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June 13, 2022

The Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Paguada v. All Star Innovations, LLC.*; Case No. 1:22-cv-1288-KPF

Dear Judge Failla:

We represent plaintiff Josue Paguada ("Plaintiff") in the above-referenced action. We submit this letter requesting a second adjournment of the initial conference set for June 21, 2022, at 3:00 p.m. We are making this request because the defendant's answer was due May 25, 2022, and has yet to appear. Plaintiff is in the process of obtaining a Certificate of Default from the Clerk of the Court as to Defendant, All Star Innovations, LLC, and will promptly be moving the Court for a Default Judgment in accordance with its Individual Rules. Therefore, Plaintiff requests 30 days to move for default judgment per this Courts Individual Rules and Practices.

Thank you for your consideration in this matter.

Respectfully submitted,  
/s/ Edward Y. Kroub  
EDWARD Y. KROUB

cc: All Counsel of Record (via ECF)

Application GRANTED. The initial pretrial conference scheduled for June 21, 2022, is hereby ADJOURNED *sine die*. Plaintiff shall file its motion for default judgment on or before July 14, 2022. The Clerk of Court is directed to terminate the pending motion at docket number 9.

Dated: June 14, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink that reads 'Katherine Polk Failla'.

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE